COURT EXHIBIT 2A

Designation Run Report for Travis Kalanick as played in Court 01/14/2026 (07-03-2025)

Designation List Report

Kalanick, Travis	2025-07-03
Kalanick, Travis	2025-07-03
PLF Affirmative	00:37:58
PLF Counter	00:00:19
DEF Counter	00:04:50
TOTAL RUN TIME	00:43:06



Page 2 of 32

DESIGNATION	SOURCE	DURATION	I D
15:18 - 15:22	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:05	KT_v9p.1
	15:18 Q. Good morning.		
	15:19 A. Good morning.		
	15:20 Q. Can you please state your name for the		
	15:21 record.		
	15:22 A. Travis Kalanick.		
16:02 - 16:04	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:03	KT_v9p.2
	16:02 Q. Have you been deposed before,		
	16:03 Mr. Kalanick?		
	16:04 A. Yes.		
16:05 - 16:09	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:10	KT_v9p.3
	16:05 Q. Can you give us on what basis you were		
	16:06 deposed?		
	16:07 Do you recall the case?		
	16:08 A. A lot of Uber cases. I can't I a		
	16:09 lot of Uber cases. Yeah.		
23:03 - 23:17	Kalanick, Travis 2025-07-03	00:00:33	KT_v9p.4
	23:03 Q. So, Mr. Kalanick, you're the founder of		
	23:04 Uber; right?		
	23:05 A. Co-founder, yeah.		
	23:06 Q. And you founded Uber in 2009?		
	23:07 A. I don't remember exactly when		
	23:08 incorporation documents were created, but in that	at	
	23:09 time period sounds right.		
	23:10 Q. Okay. And Uber was your idea?		
	23:11 A. It was actually Garrett's idea.		
	23:12 Q. And you thought you should be able to		
	push a button to get a ride; right?		
	23:14 A. That was Garrett that was Garrett's		
	23:15 part. Yeah.		
	23:16 Q. But you operationalized the idea?		
	23:17 A. Yeah.		
25:09 - 25:20	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:32	KT_v9p.5
	25:09 Q. Okay. When you started Uber, you were		
	25:10 about 32 years old?		
	25:11 A. Something in that somewhere around		
	that. I don't know exactly my age there, but I		
	25:13 could do the math. But		
	25:14 Q. So you were born in 1976; you started it		

PLF Affirmative PLF Counter DEF Counter 2 / 31

DESIGNATION	SOURCE	DURATION	I D
220.000.000	25:15 in 2009.	DUNATION	
	25:16 Generally, 32, 33 years old; right?		
	25:17 A. Yeah.		
	25:18 Q. Okay. You ran Uber from 2009 to 2017;		
	25:19 correct?		
	25:20 A. I became CEO in late 2010.		
26:07 - 26:09	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:03	KT_v9p.6
	26:07 Q. And you were also on the board of		
	26:08 directors; correct?		
	26:09 A. Yes.		
29:25 - 30:12	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:23	KT_v9p.7
	29:25 Q. Okay. So you stepped down as CEO of Ubo		- •
	30:01 in June 2017; right?		
	30:02 A. Yeah.		
	30:03 Q. You stayed on the board till 2019;		
	30:04 correct?		
	30:05 A. Yeah.		
	30:06 Q. And it was to get Uber through the IPO;		
	30:07 is that right?		
	30:08 A. No, not really.		
	30:09 Q. But it was to the point that the IPO took		
	30:10 place while you were on the board; correct	t?	
	30:11 A. The IPO did take place while I was on the		
	30:12 board.		
33:05 - 33:18	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:23	KT_v9p.8
	33:05 Q. The valuation of Uber at IPO was		
	33:06 82.4 billion; correct?		
	33:07 A. I don't know.		
	33:08 Q. You don't remember what the valuation		
	33:09 was?		
	33:10 A. No.		
	33:11 Q. Can you generally remember what was?		
	33:12 A. I mean, I could look up the stock ticker,		
	33:13 I mean, but I don't remember what it was.		
	33:14 MS. LUHANA: Okay. Well, then let's get		
	33:15 TK-4 marked as Exhibit 1332.		
	33:16 (Exhibit 1332 was received and marked		
	33:17 for identification on received and marked		
	33:18 attached hereto.)		

PLF Affirmative PLF Counter DEF Counter 3 / 31

ESIGNATION	SOURCE	DURATION	I D
33:25 - 34:18	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:38	KT_v9p.9
	33:25 Q. Mr. Kalanick, does this refresh your		
	34:01 recollection that Uber was valued at 82.4 billion		
	34:02 at the time of its IPO?		
	34:03 A. No.		
	34:04 Q. It doesn't?		
	34:05 A. No.		
	34:06 Q. Do you see this article where the title		
	of it is it's a New York Times article; it		
	34:08 says, "Uber IPO values ride-hailing giant at		
	34:09 82.4 billion"?		
	34:10 A. Yes.		
	34:11 Q. Okay. And do you see the line in the		
	34:12 center of the article where it says:		
	34:13 "Uber priced its public offering on		
	34:14 Thursday at \$45 a share near the bottom of		
	34:15 its expected price range valuing the		
	34:16 ride-hailing company at about 82.4 billion";		
	34:17 correct?		
	34:18 A. Yes, I do see that.		
35:01 - 35:13	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:24	KT_v9p.10
	35:01 Q. After the IPO, your net worth was		
	35:02 estimated as 5.4 billion.		
	35:03 A. Okay.		
	35:04 Q. Does that seem accurate?		
	35:05 A. I have no idea.		
	35:06 Q. You don't know what your net net worth		
	35:07 was		
	35:08 A. No.		
	35:09 Q after the IPO?		
	35:10 A. No.		
	35:11 Q. Do you recall selling Uber stock?		
	35:12 A. After the in the months following the		
	35:13 IPO, yeah. After lockup, yes.		
36:01 - 36:23	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:41	KT_v9p.1
	36:01 Q. So how much did you sell your stock for		
	36:02 in December?		
	36:03 A. I don't know.		
	36:04 Q. Was it 1 billion?		

PLF Affirmative PLF Counter DEF Counter 4 / 31

DESIGNATION	SOURCE	DURATION	I D
	36:06 front of me. If you have them, we can look at	·	
	36:07 them, but I don't know the specifics.		
	36:08 Q. So you don't recall if you made billions		
	36:09 of dollars selling Uber IPO stock?		
	36:10 A. I don't think that's what I said.		
	36:11 Q. Well, let's generally try to estimate.		
	36:12 You said you're going to give truthful		
	36:13 testimony today; correct?		
	36:14 A. Correct, yes.		
	36:15 Q. So I'd like you to give a general		
	36:16 estimate		
	36:17 A. Yeah.		
	36:18 Q of how much you sold your Uber IPO		
	36:19 stock for.		
	36:20 A. I don't know the exact, but it was		
	36:21 certainly in the billions of dollars.		
	36:22 Q. And do you recall how many billion?		
	36:23 A. I do not.		
39:03 - 39:08	Kalanick, Travis 2025-07-03	00:00:10	KT_v9p.12
	39:03 Q. Okay. And when you stepped down from the		
	39:04 board of directors, did you sell the remaining		
	39:05 Uber stock you had at that time?		
	39:06 A. When I stepped down?		
	39:07 Q. Yes.		
	39:08 A. No. I had already sold.		
39:24 - 40:01	Kalanick, Travis 2025-07-03	00:00:03	KT_v9p.13
	39:24 Q. Okay. So you didn't keep any Uber stock;		
	39:25 correct?		
	40:01 A. That's correct.		
40:23 - 41:02	Kalanick, Travis 2025-07-03	00:00:11	KT_v9p.14
	40:23 Q. So you completely walked away from Uber		
	40:24 financially and organizationally; true?		
	40:25 A. Yeah.		
	41:01 Q. You didn't want to stay on to fix the		
	41:02 safety problems Uber had?		
41:04 - 41:04	Kalanick, Travis 2025-07-03	00:00:03	KT_v9p.15
	41:04 THE WITNESS: I got off the board.		-
61:04 - 61:16	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:45	KT_v9p.16

PLF Affirmative PLF Counter DEF Counter 5 / 31

	KI_V:	pp - KALANICK, TRAVIS - VSP_AS-Played III Coult	11/14/2020	
DESIGNATION	SOURCE		DURATION	I D
	61:05	it's important to set core values?		
	61:06 A	. Yeah. Yes.		
	61:07 Q	. And so core values establish the culture		
	61:08	of a company; right?		
	61:09 A	. Yeah. I I think the culture can be		
	61:10	influenced by core values. It's a mix of		
	61:11	reflecting what's there plus sort of aspiring to		
	61:12	where you want to be.		
	61:13 Q	. They help guide would you agree with		
	61:14	me, they help guide the company's behavior?		
	61:15 A	. Yeah, they guide sort of the aspiration		
	61:16	of where you want to go. I think that's fair.		
62:06 - 62:11	Kalanick,	Travis 2025-07-03 - PIP MP4	00:00:09	KT_v9p.17
	62:06 Q	. And you established Uber's core values;		
	62:07	right?		
	62:08 A	. Yeah.		
	62:09 Q	. Okay. And sometimes you call these		
	62:10	Uber's "cultural values"?		
	62:11 A	. Yeah.		
62:21 - 63:12	Kalanick,	Travis 2025-07-03 - PIP MP4	00:00:40	KT_v9p.18
	62:21 Q	. Okay. And do you remember what the		
	62:22	cultural values were that you set for Uber?		
	62:23 A	. There's, like, 13. I'm sure you've got a		
	62:24	list somewhere on you.		
	62:25 Q	. Well, do you remember some of them off		
	63:01	the top of your head?		
	63:02 A	. Let's see. I think "super pumped" was		
	63:03	one of them.		
	63:04	Was there one was it was there one,		
	63:05	"optimistic leadership"? I think that may have		
	63:06	been one of them. Yeah.		
	63:07	Yeah, but, I mean, it would be better		
	63:08	just to go through a list.		
	63:09 Q	. Do you remember "always be hustling"?		
	63:10 A	. Of course, yeah.		
	63:11 Q	. Was it a phrase that you coined?		
	63:12 A	. Probably, yeah.		
63:19 - 64:06	Kalanick,	Travis 2025-07-03 - PIP MP4	00:00:19	KT_v9p.19
	63:19 Q	. Do you remember "meritocracy and		
	63:20	toe-stepping"?		
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PLF Affirmative PLF Counter DEF Counter 6 / 31

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DESIGNATION	SOUR	CE		DURATION	I D
	63:21	Α.	Yes.		
	63:22	Q.	Do you remember "let builders build"?		
	63:23	A.	Yeah.		
	63:24	Q.	Do you remember "principle		
	63:25		confrontation"?		
	64:01	A.	Yes.		
	64:02	Q.	So these were Uber's cultural values from		
	64:03		the beginning; right?		
	64:04	A.	They are some of them. There are others		
	64:05		that you haven't mentioned.		
	64:06		But, yes, those are some of them.		
65:17 - 66:04	Kalani	ick,	Travis 2025-07-03 - PIP MP4	00:00:26	KT_v9p.20
	65:17	Q.	Okay. And you would rely, as we said, on		
	65:18		the cultural values to guide for folks to guide		
	65:19		their decisions while they were working at Uber?		
	65:20	A.	Sure. Yeah.		
	65:21	Q.	And you would rely on the cultural values		
	65:22		to inform their conduct and behavior while working	5	
	65:23		at Uber?		
	65:24	A.	Again, there's like an aspirational part		
	65:25		of it but yes.		
	66:01	Q.	Sure.		
	66:02		Do you recall the cultural values being		
	66:03		used for onboarding new employees and training?		
	66:04	A.	Yes.		
67:03 - 67:08	Kalani	ick,	Travis 2025-07-03 - PIP MP4	00:00:11	KT_v9p.21
	67:03	Q.	do you think you (edited)		
	67:04		were a pretty hands-on CEO at the time?		
	67:05	A.	I think that's a fair assessment.		
	67:06	Q.	Okay. And you had high expectations of		
	67:07		your Uber team?		
	67:08	A.	Yeah.		
68:02 - 68:07	Kalani	ick, '	Travis 2025-07-03 - PIP MP4	00:00:08	KT_v9p.22
	68:02	0.	But Uber achieved great financial		
	68:03		success?		
	68:04	A.	Yeah.		
	68:05		Like growth, domination, market share in		
	68:06	•	this industry?		
	00.00				

PLF Affirmative PLF Counter DEF Counter 7 / 31

DESIGNATION	SOURCE	DURATION	I D
85:06 - 85:07	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:07	KT_v9p.23
	85:06 MS. LUHANA: Okay. So let's mark as		
	85:07 it's TK-16, and this would be Exhibit 1337.		
85:12 - 85:16	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:14	KT_v9p.24
	85:12 Q. And you'll see, Mr. Kalanick, this is		
	85:13 also an email thread. It starts with you, and		
	85:14 then it's sent to Meghan Joyce, cc'ing a number of		
	85:15 people. And the subject line is "Re: FYI -		
	85:16 another article."		
86:11 - 86:17	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:16	KT_v9p.25
	86:11 Q. But there's a link to the article there		
	86:12 on on the page ending in 7024. And you'll see		
	86:13 it says it's a Boston Globe article; it's a		
	86:14 link, "After rape unlicensed taxi call for		
	86:15 increased regulations."		
	86:16 A. Yeah. I mean, I see the link. I just		
	86:17 don't see the story.		
88:17 - 89:07	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:36	KT_v9p.26
	88:17 And then if you go to 7023, you'll see		
	88:18 there's a Tweet at the bottom. And it's Christy		
	88:19 Motch @Boston Globe, and you'll see it on your		
	88:20 screen there too, Mr. Kalanick, if you look.		
	88:21 A. Okay. There we go.		
	88:22 Q. And it says:		
	88:23 "This is terrifying and unfortunately is		
	88:24 going to force me to reconsider my use of		
	88:25 Uber," in light of that that article that		
	89:01 was circulated; right?		
	89:02 A. I don't think that was by Christy Motch.		
	89:03 Q. No. It's @ChristyMotch. That's what it		
	89:04 says. That's from the Jackie woman there.		
	89:05 A. Okay. Yeah. Yeah.		
	89:06 Q. Right.		
	89:07 A. Yeah, yeah.		
90:09 - 91:14	Kalanick, Travis 2025-07-03 - PIP MP4	00:01:11	KT_v9p.27
	90:09 And you say to Meghan:		
	90:10 "Meghan, you've got to treat this like		
	90:11 someone actually called out your business,		
	90:12 not just the business that happens to pay		

PLF Affirmative PLF Counter DEF Counter 8 / 31

DESIGNATION	SOURCE	DURATION	I D
	90:13 your salary. More passion, more connected to		
	90:14 the conversation, more involved, and ready to		
	90:15 engage in a human way. I suggest throwing		
	90:16 out three successive Tweets on this, and you		
	90:17 say "see below"; correct?		
	90:18 And the first Tweet, you say:		
	90:19 "Every driver on @Uber_bos passes a		
	90:20 background check stronger than anything that		
	90:21 Boston requires taxi companies to do"; right?		
	90:22 Did I read that correctly?		
	90:23 A. I think you yeah, I believe you		
	90:24 read you read that correctly.		
	90:25 Q. And then the second Tweet is:		
	91:01 "@uber_bos collects all feedback and		
	91:02 ratings to ensure we only work with		
	91:03 high-quality, highly rated transportation		
	91:04 providers."		
	91:05 Did I read that correctly?		
	91:06 A. I believe so, yeah.		
	91:07 Q. And then your last Tweet there is:		
	91:08 "@Uber_bos's technology provides		
	91:09 sophisticated data collection that results in		
	91:10 major accountability to any transportation		
	91:11 provider and makes @uber_bos the safest way		
	91:12 to get around the city."		
	91:13 Did I read that correctly?		
	91:14 A. Yes.		
100:05 - 100:08	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:07	KT_v9p.28
	100:05 Q. Mr. Kalanick, would you agree with me		
	100:06 that it's important for a company to tell the		
	100:07 truth?		
	100:08 A. Yes.		
101:16 - 101:19	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:14	KT_v9p.29
	101:16 Q. So you'd agree that a company shouldn't		
	101:17 lie by omission?		
	101:18 A. I think there's a lot of specifics on		
	that one. I'd have to see the specific situation.		
103:03 - 103:06	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:12	KT_v9p.30
	103:03 Q. Is it important for if a company's		
	103:04 product involves public safety like giving		

PLF Affirmative PLF Counter DEF Counter 9 / 31

DESIGNATION	SOURCE	DURATION	I D
	103:05 strangers rides, is it important not to lie by		
	103:06 omission about safety to consumers?		
103:08 - 103:09	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:04	KT_v9p.31
	103:08 THE WITNESS: I think, again, I'd need		
	103:09 some details to answer that question well.		
104:01 - 104:08	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:20	KT_v9p.32
	104:01 Q. So Uber provides rides to passengers;		
	104:02 correct?		
	104:03 A. Yes.		
	104:04 Q. And if there is information out there		
	about the safety of those rides for example, an		
	104:06 increased risk of sexual assaults happening on		
	104:07 Uber's platform, is it important to disclose those		
	104:08 details to the public?		
104:10 - 104:11	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:02	KT_v9p.33
	104:10 THE WITNESS: I mean, I don't know.		
	104:11 BY MS. LUHANA:		
104:20 - 104:22	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:06	KT_v9p.34
	104:20 Q. And you don't know if that's important to		
	104:21 disclose to the public in terms of the increased		
	104:22 risk of sexual assaults		
105:02 - 105:19	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:54	KT_v9p.35
	105:02 No. I think what I meant to say was that		
	105:03 every city or jurisdiction you're in should		
	105:04 be making the decision about what should be		
	105:05 disclosed and what shouldn't be.		
	105:06 Like, for instance, like every there's		
	105:07 taxis in every city out there. What are the		
	105:08 rules around taxis should probably be the		
	105:09 same for other sort of transportation		
	105:10 mechanisms or subways or things like this on		
	these topics, right.		
	105:12 So what are I would I would start		
	by saying, What are the what are the		
	105:14 requirements for a taxi system?		
	105:15 And probably, you know, those have		
	105:16 existed for a hundred years; more. Those		
	105:17 requirements are probably a really good		
	105:18 starting point for what should be disclosed		

PLF Affirmative PLF Counter DEF Counter 10 / 31

DESIGNATION	SOURCE	DURATION	I D
	by new forms of transportation.		
118:12 - 118:19	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:24	KT_v9p.36
	118:12 Q. Do you recall thousands of reports that		
	118:13 were filed; that were reported to Uber of women		
	being raped or sexually assaulted or subject to		
	118:15 sexual misconduct on your platform?		
	118:16 A. So I don't remember specific numbers but		
	definitely remember reports of that.		
	118:18 Q. Of what?		
	118:19 A. Of all the things you've said.		
125:18 - 125:23	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:16	KT_v9p.37
	125:18 Q. Do you agree that getting people from		
	125:19 Point A to Point B safely and reliably is the		
	125:20 single most important thing that Uber does?		
	125:21 A. Yeah, I don't know if it's the single		
	125:22 most important thing, but it's certainly it's		
	125:23 pretty high up there.		
126:22 - 127:05	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:18	KT_v9p.38
	126:22 Q. I want to know what you prioritized above		
	126:23 safety, if anything?		
	126:24 A. Oh, okay. So you said "safe and reliable		
	126:25 rides."		
	127:01 Q. Mm-hmm.		
	127:02 A. Yeah. It's super important.		
	127:03 I can't come up with anything right now		
	127:04 that's more important. There might be others. I		
	127:05 just can't think of it right now.		
132:17 - 132:20	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:12	KT_v9p.39
	132:17 Q. Mr. Kalanick, a lot of rides weren't safe		
	that passengers took, right, because there were		
	132:19 lots of reports of sexual assault and sexual		
	misconduct that took place on Uber's platform?		
132:22 - 132:23	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:04	KT_v9p.40
	132:22 THE WITNESS: Yeah, not every ride was		-
	132:23 safe. I'd agree with that.		
132:25 - 133:02	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:09	KT_v9p.41
	132:25 Q. A lot of rides weren't safe; right?		- •
	133:01 A. There are there are many rides that		
	133:02 were not safe.		

PLF Affirmative PLF Counter DEF Counter 11/31

DESIGNATION	SOURCE	DURATION	I D
133:08 - 133:09	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:07	KT_v9p.42
	133:08 MS. LUHANA: So let's mark as		- •
	133:09 Exhibit 1339 - (edited)		
133:14 - 133:15	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:03	KT_v9p.43
100.11 100.10	133:14 Q. So, Mr. Kalanick, you'll see	00.00.00	
	133:15 Exhibit 1339.		
134:03 - 134:07	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:09	KT_v9p.44
134.03 134.01	134:03 And you'll see you're involved in the	00.00.03	K1_V3p.44
	134:04 exchange, as well, and it's dated September 16,		
	134:05 2013.		
	134:06 A. It looks like September 15th at the		
	134:07 bottom.		
134:21 - 135:02	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:18	KT_v9p.45
131.21 133.02	134:21 Q. So this is a year after you started	00.00.10	1.1_vsp.13
	134:22 peer-to-peer ridesharing, right, 2013?		
	134:23 A. In D.C.? No. I don't think it's a year		
	134:24 after we started in D.C.		
	134:25 Q. When did you start in D.C.; do you		
	135:01 recall?		
	135:02 A. Definitely less than a year before.		
135:06 - 136:01	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:53	KT_v9p.46
	135:06 Q. And you see Nitasha, who is a writer at		
	135:07 Valleywag, is asking about a choking incident.		
	135:08 Do you see that there?		
	135:09 A. Let's see. Hold on. Yeah, I do.		
	135:10 Q. Right. And then your response to it is		
	135:11 up top.		
	135:12 It says at the top of the page right		
	there, it says, "Guys, do not respond to this		
	135:14 until running an approach by me."		
	135:15 And then you call her an "Internet		
	135:16 troll."		
	135:17 Do you see that there?		
	135:18 A. Yeah. 135:19 Q. Okay. And then you go on to say on		
	135:20 Bates 6649 at the bottom of page there, you said,		
	135:21 [as read]:		
	135:22 "We need to make sure that these writers		
	135:23 don't come away thinking we are responsible,		

PLF Affirmative PLF Counter DEF Counter 12 / 31

DESIGNATION	SOURCE	DURATION	I D
	135:24 even when these things go do go bad.		
	135:25 Right? You said that there?		
	136:01 A. Yeah.		
136:16 - 136:18	Kalanick, Travis 2025-07-03	80:00:00	KT_v9p.47
	136:16 Q. So do you still believe today that Uber		
	isn't responsible when things go bad between Uber	r	
	136:18 drivers and riders?		
136:20 - 137:04	Kalanick, Travis 2025-07-03	00:00:32	KT_v9p.48
	136:20 THE WITNESS: Well, it sort of I guess		
	it sort of depends on responsible for		
	136:22 what.		
	136:23 I think that it's very important for Uber		
	136:24 to have a set of processes that do everything		
	they can to create sort of safe and reliable		
	137:01 rides.		
	137:02 But I don't think you can control		
	137:03 human humans to the degree that you can		
	make sure that nothing bad happens ever.		
137:06 - 137:18	Kalanick, Travis 2025-07-03	00:00:43	KT_v9p.49
	137:06 Q. Okay.		
	137:07 A. So if you're doing a really good job at		
	137:08 creating safe and reliable rides, but you're not		
	137:09 perfect at it, I think that there's sort of a		
	137:10 question of when if you can't control		
	individuals all the way, right. It's not like you		
	137:12 have a chip in their brain to control them.		
	137:13 If they do something bad that you can't		
	137:14 control, but you had a really great process to		
	make sure that you had the very safe and reliable		
	rides, are you responsible for this moment that a		
	137:17 human had where they did something bad, but you	J	
	137:18 weren't in control of them.		
174:14 - 174:16	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:09	KT_v9p.50
	174:14 Q. By 2017 you and Uber were facing		
	174:15 significant reputational challenges; right?		
	174:16 A. Yeah, I think that's right.		
190:22 - 191:13	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:53	KT_v9p.51
	190:22 Mr. Kalanick, by June 2017, your		
	190:23 reputation was in tatters; correct?		

PLF Affirmative PLF Counter DEF Counter 13 / 31

DESIGNATION	SOURCE	DURATION	I D
DESTONATION	190:24 A. I don't know if there's an objective way	DORATION	
	190:25 to assess where my reputation was, but it wasn't		
	191:01 in a good spot.		
	191:02 Q. And the reason that Uber had gotten to		
	191:03 that point was because of your leadership; right?		
	191:04 A. I'm not sure I agree with that.		
	191:05 Q. What part don't you agree with?		
	191:06 A. The part about it being about my		
	191:07 leadership.		
	191:08 Q. Well, you, as CEO, are at the helm of the		
	191:09 company; right?		
	191:10 A. Yes.		
	191:11 Q. And you take responsibility for where		
	191:12 Uber got at that point; right? You bear that		
	191:13 responsibility?		
191:15 - 191:15	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:02	KT_v9p.52
	191:15 THE WITNESS: Yes. Yes, I do.		
200:05 - 200:06	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:05	KT_v9p.53
	200:05 MS. LUHANA: Okay. Let's mark as		
	200:06 Exhibit 1350. (edited)		
200:11 - 200:13	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:09	KT_v9p.54
	200:11 Q. This is entitled "Exclusive: The Letter		
	200:12 Travis Kalanick Never Sent," and it's dated		
	200:13 September 5, 2019.		
201:03 - 201:21	Kalanick, Travis 2025-07-03	00:00:49	KT_v9p.55
	201:03 It's a letter from you that's enclosed,		
	201:04 and it's an unedited, 2,000-word letter that was		
	201:05 provided in entirety.		
	201:06 And it starts off with "Team," and I want		
	to focus you on certain passages here on page 3.		
	201:08 A. Okay. So I want to start with, I didn't		
	201:09 read I didn't write this.		
	201:10 Q. You didn't write this letter?		
	201:11 A. No.		
	201:12 Q. Who wrote this letter?		
	201:13 A. I believe it was a speech writer.		
	201:14 Q. A speech writer would who who asked		
	201:15 for this letter to be written?		
	201:16 A. I didn't.		

PLF Affirmative PLF Counter DEF Counter 14 / 31

	KI_VSP - KALANICK, TRAVIS - VSP_AS-Played III Coult o	1/14/2020	
DESIGNATION	SOURCE	DURATION	I D
	201:17 Q. Okay. And someone wrote it on your		
	201:18 behalf?		
	201:19 A. I think they were they were trying to		
	put it was, like, a speech writer working with		
	201:21 an elected official.		
202:03 - 202:04	Kalanick, Travis 2025-07-03	00:00:09	KT_v9p.56
	202:03 Q. But you did review it at that time?		
	202:04 A. I I don't remember.		
202:23 - 203:02	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:11	KT_v9p.57
	202:23 Q. But you never claimed it was fabricated;		
	202:24 right?		
	202:25 A. I might have. It's not I don't know		
	203:01 if it was fabricated. I just didn't write it. I		
	203:02 didn't I didn't review it.		
203:14 - 203:22	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:18	KT_v9p.58
	203:14 Q. But your comms person never put anything		
	203:15 out publicly, or you never directed your comms		
	203:16 person to put anything out publicly		
	203:17 A. We weren't		
	203:18 Q denying this; right?		
	203:19 A. We weren't doing anything public at this		
	203:20 time. Like, it's been many years since I've sort		
	of been out there publicly doing stuff at this		
	203:22 point.		
204:01 - 204:03	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:05	KT_v9p.59
	204:01 A. Again, I don't know if this is the speech		
	204:02 writer's stuff.		
	204:03 I definitely did not write this.		
206:17 - 206:21	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:09	KT_v9p.60
	206:17 Q. You were on the board at this time when		
	206:18 this was published; right?		
	206:19 This was September 2019; you were still		
	206:20 on the board of Uber?		
	206:21 A. Yes.		
207:15 - 208:05	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:46	KT_v9p.61
	207:15 Q. And the letter goes on to say at the		
	201.15 Q. And the letter goes on to say at the		
	207:16 bottom of this page:		
	-		

PLF Affirmative PLF Counter DEF Counter 15 / 31

DESIGNATION	SOURCE	DURATI	O N I D
	207:19 can lead to seri	ous mistakes."	-
	207:20 Do you agree w	ith that?	
	207:21 A. Yeah.		
	207:22 Q. [As read]:		
	207:23 "At scale, our m	iistakes have a great a	
	207:24 much greater in	npact on our teams, customers,	
	207:25 and the commu	unities we serve. That's why	
	208:01 small company	approaches must change when we	
	208:02 scale. I succeed	ded by acting small but	
	208:03 failed in being b	pigger."	
	208:04 Do you agree w	ith that?	
	208:05 A. I'm just rereadi	ng it. Give me a second.	
208:06 - 209:12	Kalanick, Travis 2025-07-0	D3 - PIP MP4 00:01:1	9 KT_v9p.62
	208:06 I don't agree wi	th everything here.	
	208:07 Q. Well, do you ag	ree with, "I succeeded by	
	208:08 acting small bu	t failed in being bigger"?	
	208:09 A. I don't complet	ely agree with that, no.	
	208:10 Q. Okay. And it go	es on to say [as read]:	
	208:11 "And that contr	ibuted to an avalanche of	
	208:12 organizational	debt throughout our company."	
	208:13 "An avalanche o	of organizational debt"; do	
	208:14 you agree with	that?	
	208:15 A. I think as organ	izations grow, there can	
	208:16 be organization	nal debt. I think the notion that	
	208:17 there's an avala	anche is overdone. It's not	
	208:18 that's not accur	rate.	
	208:19 Q. It goes on to say	y:	
	208:20 "There were too	o many first-time managers,	
	208:21 63 percent of al	ll managers having never	
	208:22 managed befor	e."	
	208:23 Do you see that	statement there?	
	208:24 A. Mm-hmm.		
	208:25 Q. Do you agree w	ith it?	
	209:01 A. I don't know if i	t was true.	
	209:02 Q. Okay.		
	209:03 "Processes that	t didn't scale for the size	
	209:04 or complexity of	of the organization. Process	
	209:05 for a 400-perso	n company cannot work at a	
	209:06 company of 14,	000."	
	209:07 Do you agree w	ith that statement?	

PLF Affirmative PLF Counter DEF Counter 16 / 31

DESIGNATION	SOURCE	DURATION	I D
	209:08 A. Tagree with the second part of it but		
	209:09 not the first.		
	209:10 I think we look, I don't think we were		
	209:11 perfect on processes, but I think we were pretty		
	209:12 good.		
210:19 - 211:04	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:32	KT_v9p.63
	210:19 "And putting people first means accepting		
	210:20 when we're wrong and not being self-righteous		
	210:21 when we're right."		
	210:22 Do you agree with that statement?		
	210:23 A. Like, I think it's important to accept		
	210:24 when you're wrong and not be self-righteous when	l	
	210:25 you're right when you're right.		
	211:01 I'm not sure what that has to do with		
	211:02 putting people first. But I agree with the		
	211:03 statement of accepting when you're wrong and not	t	
	being self-righteous when you're right.		
211:09 - 211:09	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:03	KT_v9p.64
	211:09 It's Exhibit 1351 (edited)		
211:14 - 212:06	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:43	KT_v9p.65
	211:14 Q. Mr. Kalanick, you'll see this is an email		
	211:15 from your Gmail account. It's travisk@gmail, and		
	211:16 it's to the Uber team. And it's dated August 17,		
	211:17 2014.		
	211:18 Do you see that there?		
	211:19 A. Yeah.		
	211:20 Q. So there is it looks like you did TK		
	211:21 Q&As, and there was a question that was submitted	d	
	211:22 here.		
	211:23 It's in the center of the page. It says,		
	211:24 "Do we have any plan on the rider side to		
	211:25 improve safety? For example, add a button to		
	212:01 call for help or inform us of an accident."		
	212:02 Do you see that there?		
	212:03 A. Yeah.		
	212:04 Q. And so you, essentially, say that you		
	212.05 death belter when feature has accept to device		
	212:05 don't believe that feature has much to do with		
	212:06 don't believe that reature has much to do with 212:06 safety; correct?		

PLF Affirmative PLF Counter DEF Counter 17 / 31

DESIGNATION	SOURCE	DURATION	I D
	212:08 THE WITNESS: Oh, okay. Yeah, I do see		KT_v9p.66
	212:09 that. Yeah, yeah.		
213:03 - 215:02	Kalanick, Travis 2025-07-03	00:01:40	KT_v9p.67
	213:03 "Safety should be first focused on		
	213:04 preventing incidences versus responding to		
	213:05 them. And responding to incidents is		
	213:06 typically not about safety. It's about		
	213:07 service." Right?		
	213:08 A. Yeah.		
	213:09 Q. And you say:		
	213:10 "For example, the feature request		
	213:11 mentioned in this question doesn't really		
	213:12 improve safety. Responding to an accident		
	213:13 doesn't make the ride safer but does make the		
	213:14 rider feel more comfortable once an accident		
	213:15 has happened. And if someone really needed		
	213:16 help immediately following an accident,		
	213:17 wouldn't they be better off calling 911."		
	213:18 Right?		
	213:19 That's what you wrote there?		
	213:20 A. Yeah.		
	213:21 Q. And that last paragraph goes on to say:		
	"But once you get in the actual incident		
	213:23 prevention game, safety is not about		
	213:24 rider-side or driver-side features. It's		
	213:25 about what are the root causes of certain		
	214:01 accidents or incidents and creating a system		
	214:02 that incentivizes safe behavior and		
	214:03 outcomes." Right?		
	214:04 A. Yep.		
	214:05 Q. [As read]:		
	214:06 "Are there behaviors we can monitor and		
	214:07 score that are highly correlated to traffic		
	214:08 accidents or the lack thereof? Are there		
	214:09 certain drivers that drive more safely than		
	214:10 others? Can safe drivers get better		
	214:11 commissions? Can we early identify unsafe		
	214:12 driving behavior and deactivate unsafe		
	214:13 drivers? Are there certain parts of trips		
	that are more unsafe than others."		

PLF Affirmative PLF Counter DEF Counter 18 / 31

	KI_VSP INICATION, THAVIS VSP_AS I tayed in court of	.,, 2020	
DESIGNATION	SOURCE	DURATION	I D
	214:15 Did I read that correctly?		
	214:16 A. Yes. Yeah.		
	214:17 Q. [As read]:		
	214:18 "And are there ways for new technology to		
	214:19 mitigate risk during those periods of time."		
	214:20 Correct?		
	214:21 A. Yeah.		
	214:22 Q. You can set that aside.		
	214:23 A. Some good ideas in there.		
	214:24 Q. And that was 2014, right, Mr. Kalanick?		
	214:25 A. I don't know. Let me check.		
	215:01 Q. Yeah.		
	215:02 A. Yeah.		
215:03 - 215:04	Kalanick, Travis 2025-07-03	00:00:11	KT_v9p.68
	215:03 MS. LUHANA: Okay. Let's mark, as 1352,		
	215:04 TK-96.		
215:09 - 215:10	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:07	KT_v9p.69
	215:09 Q. And you'll see, Mr. Kalanick, these notes		
	215:10 are dated December 23, 2016 (edited)		
217:15 - 217:17	, , ,	00:00:05	KT_v9p.70
211.13 - 211.11	Kalanick, Travis 2025-07-03 - PIP MP4	00.00.05	K1_V3p.70
	217:15 Q. It showed you're a custodian, and Joe		
	217:16 Sullivan is a custodian on this.		
	217:17 A. Okay. So maybe he wrote this.		
218:22 - 219:23	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:58	KT_v9p.71
	218:22 Q. Yeah. So the sentiment from Travis, it		
	218:23 says it says, "Poor measurement, analytics, and		
	218:24 metrics of safety issues." Right?		
	218:25 A. Yeah.		
	219:01 Q. It says, "Increasing serious safety		
	219:02 incidences as a percentage of trips." Correct?		
	219:03 A. Yes.		
	219:04 Q. It says, "Poor to terrible L3/L4 IRT		
	219:05 support going into December." Right?		
	219:06 A. That's what it says.		
	219:07 Q. "Poor processes around regulatory and		
	219:08 safety compliance." Correct?		
	219:09 A. Yes.		
	219:10 Q. "Poorly architected deactivation		
	219:11 policies." Correct?		

PLF Affirmative PLF Counter DEF Counter 19 / 31

DESIGNATION	SOURCE	DURATION	I D
	219:12 A. Yes.		
	219:13 Q. "Poorly implemented deactivation		
	219:14 policies." Correct?		
	219:15 A. Yeah. Yeah.		
	219:16 Q. "Little to no alignment between safety		
	219:17 product efforts and actual safety incidents."		
	219:18 Right?		
	219:19 A. That's what it says, yeah.		
	219:20 Q. "Little to no alignment between safety		
	219:21 product efforts and legal and insurance outcomes	."	
	219:22 Correct?		
	219:23 A. Yep.		
219:24 - 220:11	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:40	KT_v9p.72
	219:24 Q. Let's turn to the next page.		
	219:25 And it says, [as read]:		
	220:01 "Progress: 2016 was full of turmoil, but		
	we still accomplished quite a bit. In H1		
	220:03 2016, we had committed to reducing dangerous		
	220:04 driving incident rate by at least 20 percent		
	220:05 and interpersonal conflict incident rate by		
	220:06 at least 10 percent globally. As of 2016		
	220:07 as of July 2016, we had reduced the dangerous		
	220:08 driving rate by 7 percent and interpersonal		
	220:09 conflict rate by 2 percent."		
	220:10 Correct.		
	220:11 A. That's what it says.		
220:12 - 220:17	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:19	KT_v9p.73
	220:12 Q. And IPC includes sexual assault?		
	220:13 A. I don't know.		
	220:14 Q. And as of July 2016, it was only reduced,		
	220:15 as it says, by 2 percent; right?		
	220:16 A. It says dangerous interpersonal conflict		
	rate by 2 percent. That's what it says, yeah.		
223:06 - 223:07	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:08	KT_v9p.74
	223:06 MS. LUHANA: Okay. Let's turn to		
	223:07 let's mark as 1353, TK-97.		
223:19 - 224:03	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:20	KT_v9p.75
	223:19 (VIDEO PLAYED AS FOLLOWS.)		•
	223:20 "THE WITNESS: Failure is when is		

PLF Affirmative PLF Counter DEF Counter 20 / 31

DESIGNATION	SOURCE	DURATION	I D
	223:21 maybe when at least I feel like I failed		
	223:22 when I didn't put everything I had into a		
	223:23 problem.		
	"So really it goes back to the analogy I		
	223:25 made at the beginning is if you don't put		
	it all out there, if you don't put everything		
	you've got into solving the problem, then		
	224:03 that's failure."		
224:06 - 224:09	Kalanick, Travis 2025-07-03	00:00:09	KT_v9p.76
	224:06 Q. Mr. Kalanick, sitting here today, do		
	you was there anything more you could have do	ne	
	224:08 to reduce the risk of sexual assault while you		
	224:09 were CEO of Uber?		
224:11 - 224:12	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:04	KT_v9p.77
	224:11 THE WITNESS: I'm not sure. I don't		
	224:12 know.		
224:14 - 224:19	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:21	KT_v9p.78
	224:14 Q. Did you put everything into it to solve		
	224:15 the safety problem at Uber?		
	224:16 A. I mean, I was I was working super long		
	224:17 hours. Like, at some point, sleep is more		
	224:18 important than more hours.		
	224:19 Yeah, I I can't say for sure.		
225:07 - 225:15	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:21	KT_v9p.79
	225:07 Q. Is there anything more you wish you would		- ,
	225:08 have done while you were CEO of Uber to address		
	225:09 the safety issue?		
	225:10 A. Yeah, nothing's coming to mind right now.		
	225:11 But there's always there's always		
	225:12 you know, you can look at the past and try to find		
	225:13 something you could have done.		
	225:14 I just nothing is coming to mind right		
	225:15 now.		
226:03 - 226:04	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:04	KT_v9p.80
	226:03 Q. Good afternoon, Mr. Kalanick. John Eddie		
	226:04 Williams. Lintroduced myself earlier. (edited)		
226:08 - 226:18	•	00:00:31	KT v0= 01
ZZ0.U0 - ZZ0:18	Kalanick, Travis 2025-07-03 - PIP MP4 226:08 Q. during the six and a half years is (edited)	00.00:31	KT_v9p.81
	226:09 that approximately how long you were CEO of Ube	r?	
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PLF Affirmative PLF Counter DEF Counter 21 / 31

DESIGNATION	SOURCE		DURATION	I D
	226:10 A. Y	eah, something like that. That's		
	226:11 s	omething like that.		
	226:12 Q. H	low many women during that six and a half		
	226:13 y	ears were subject to sexual misconduct,		
	226:14 h	arassment, assault, violence by an Uber driver on		
	226:15 t	he platform?		
	226:16 A. I	don't know.		
	226:17 Q. V	Vhat's your best estimate?		
	226:18 A. I	really don't have one.		
227:04 - 227:05	Kalanick, Tra	avis 2025-07-03 - PIP MP4	00:00:04	KT_v9p.82
	227:04 Q. D	vid you count?		
	227:05 A. I	certainly did not.		
227:20 - 228:04	Kalanick, Tra	avis 2025-07-03 - PIP MP4	00:00:31	KT_v9p.83
	227:20 Q. C	an you tell us under oath with certainty		
	227:21 t	hat somebody counted them during the six and a		
		alf years you were CEO; yes or no?		
		ook, we are we are talking about		
		5 years ago, my friend. It was a long time ago.		
	227:25 S	o I can't remember every detail from 15 years		
	228:01 a	go.		
	228:02 B	But what I can say is that we were always		
	228:03 fo	ocused on making Uber the safest way to get		
	228:04 a	round.		
237:03 - 237:22	Kalanick, Tra	avis 2025-07-03 - PIP MP4	00:00:48	KT_v9p.84
	237:03 Q. D	oid Uber ever have a women-preferred		
	237:04 o	ption in the United States during your six and a		
	237:05 h	alf years?		
	237:06 A. C	ertainly, at some point, we were		
	237:07 t	hinking about it. I'm not sure if it launched or		
	237:08 n	ot.		
	237:09 It	may have launched in small tests, but		
	237:10 I	don't know if it ever went beyond that. I can't		
	237:11 r	emember. We were certainly talking about it.		
	237:12 Q. Y	eah, talk. But I'm asking if you		
	237:13 a	ctually gave the women an option in the United		
	237:14 S	tates to have a woman-preferred driver.		
	237:15 Y	es or no: Did you or did you not?		
		es or no: Did you or did you not? can't say for sure. I can't say for		
	237:16 A. I			

PLF Affirmative PLF Counter DEF Counter 22 / 31

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DESIGNATION	SOURCE	DURATION	I D
	you, during your six and a half years?		
	237:20 A. Again, I feel like we've that this		
	feature existed somewhere, but I can't say for		
	237:22 sure.		
240:09 - 240:13	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:19	KT_v9p.85
	240:09 Q. Are there high-risk factors in Uber		
	240:10 rides, such as certain things that certain		
	240:11 events that make increase the risk that there		
	240:12 will be an act of sexual misconduct, harassment,		
	240:13 assault, or violence?		
240:15 - 240:24	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:20	KT_v9p.86
	240:15 THE WITNESS: Like what specifically?		
	240:16 BY MR. WILLIAMS:		
	240:17 Q. Well, like a ride being a woman, a solo		
	passenger, a male driver, like, being near a		
	240:19 bar		
	240:20 A. Yeah.		
	240:21 Q the woman being intoxicated. It would		
	be late at night, things like that.		
	240:23 Are those those are would you agree		
	240:24 those are high-risk factors?		
241:01 - 241:06	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:15	KT_v9p.87
	241:01 THE WITNESS: Yeah. Like, I don't have		
	the statistics.		
	241:03 But generally, I would say, if a		
	241:04 passenger has been drinking or it's late at		
	241:05 night, that's going to be a time when more		
	241:06 bad things happen.		
241:08 - 241:11	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:10	KT_v9p.88
	241:08 Q. And when did you find first find out		
	241:09 that there were factors, high-risk factors like		
	that where more bad things would happen on you	r	
	241:11 platform?		
241:13 - 241:15	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:05	KT_v9p.89
	241:13 THE WITNESS: I mean, this is something		
	241:14 in the transportation world you just know		
	241:15 immediately.		
241:18 - 241:22	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:09	KT_v9p.90

PLF Affirmative PLF Counter DEF Counter 23 / 31

DECICNATION	sounce	· ·	1.5
DESIGNATION	SOURCE	DURATION	I D
	241:19 half years you were CEO?		
	241:20 A. You know, or something. I don't know,		
	241:21 "whole six and a half," but the larger portion of		
	241:22 that.		
246:20 - 247:04	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:17	KT_v9p.91
	246:20 Q. You recall a video that was made of you		
	246:21 in an Uber; correct?		
	246:22 A. Oh, yeah, yeah. Yes, I do.		
	246:23 Q. Okay.		
	246:24 A. Yeah.		
	246:25 Q. I'm let's look at a few minutes of		
	247:01 it		
	247:02 A. Let's go.		
	247:03 Q and then I want to talk ask you		
	247:04 some questions about it. Okay?		
247:07 - 247:07	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:02	KT_v9p.92
	247:07 MR. MELUGIN: It will be Exhibit 4800.		
247:14 - 247:16	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:07	KT_v9p.93
	247:14 MR. MELUGIN: And we'll make the entire		
	247:15 video 4801, just for this is just an		
	247:16 excerpt from the same video.		
247:17 - 247:23	Kalanick, Travis 2025-07-03 - PIP MP4	00:03:15	KT_v9p.94
	247:17 (Exhibit 4801 was received and marked		
	247:18 for identification on received and marked		
	247:19 attached hereto.)		
	247:20 (Video marked as Exhibit 4800 was		
	247:21 played.)		
	247:22 THE WITNESS: That's the first time I've		
	247:23 seen that video.		
248:03 - 248:08	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:15	KT_v9p.95
	248:03 Q. Oh, so that was you in the video; right?		
	248:04 A. Yeah. Yeah.		
	248:05 Q. And that was February 5, 2017; right?		
	248:06 A. I don't know the exact date. But it		
	248:07 sounds sounds right. Sounds in that neck of		
	248:08 the woods.		
250:13 - 250:14	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:05	KT_v9p.96
	250:13 Q. Did you use one of those nondisclosure		
	250:14 agreements and make a deal with this driver?		

PLF Affirmative PLF Counter DEF Counter 24 / 31

DESIGNATION	SOURCE	DURATION	I D
250:16 - 250:19	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:06	KT_v9p.97
	250:16 THE WITNESS: Yes, I believe that's the		
	250:17 case.		
	250:18 BY MR. WILLIAMS:		
	250:19 Q. And you paid him \$200,000?		
250:21 - 250:22	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:02	KT_v9p.98
	250:21 THE WITNESS: I don't remember the exact		
	250:22 amount.		
250:24 - 251:03	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:08	KT_v9p.99
	250:24 Q. Is that is that the ballpark?		-
	250:25 A. I can't say. I don't remember. But		
	251:01 there was something. I don't remember the amour	nt.	
	251:02 Q. You personally paid it?		
	251:03 A. I believe so, yeah.		
251:04 - 251:09	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:10	KT_v9p.100
	251:04 Q. For him to keep this to cover this		
	251:05 incident up?		
	251:06 A. No. It was already out there.		
	251:07 Q. Well, then why did you have him sign a		
	251:08 nondisclosure agreement?		
	251:09 A. Yeah.		
251:11 - 251:12	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:09	KT_v9p.101
	251:11 THE WITNESS: I don't know. Honestly, I		
	251:12 don't know. Poor judgment.		
251:22 - 252:06	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:25	KT_v9p.102
	251:22 Q. And you never mandated there be cameras		
	in the cars during your six and a half years;		
	251:24 correct?		
	251:25 A. There may have been certain jurisdictions		
	252:01 where they were, but it was certainly never a		
	252:02 national policy.		
	252:03 Q. And when you use a camera, it can		
	document these events that occur, and document s	50	
	252:05 that there's no he said/she said. It's right		
050 60 055	252:06 there on the video; right?	00.00.1=	
252:08 - 252:15	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:15	KT_v9p.103
	252:08 THE WITNESS: I think it can help in that		
	252:09 regard.		

PLF Affirmative PLF Counter DEF Counter 25 / 31

DESIGNATION	SOURCE	DURATION	I D
	252:10 BY MR. WILLIAMS:		
	252:11 Q. It can help in the investigation?		
	252:12 A. Of course. Yeah.		
	252:13 Q. And it could help an investigation where		
	252:14 there's been sexual misconduct, sexual harassm	nent,	
	252:15 sexual assault, or sexual violence?		
252:17 - 252:18	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:05	KT_v9p.104
	252:17 THE WITNESS: I think probably in a large		
	252:18 percent of them, right.		
252:20 - 252:21	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:03	KT_v9p.105
	252:20 Q. And it would be deter and cameras		
	252:21 would be a deterrent		
252:23 - 252:24	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:02	KT_v9p.106
	252:23 BY MR. WILLIAMS:		- •
	252:24 Q to all of those four things; right?		
253:01 - 253:03	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:03	KT_v9p.107
	253:01 BY MR. WILLIAMS:		
	253:02 Q. In your opinion?		
	253:03 A. I think that's fair.		
305:19 - 305:20	Kalanick, Travis 2025-07-03	00:00:06	KT_v9p.108
	305:19 Eric Alexander. (edited)		
	305:20 He was one of your top people; right?		
305:21 - 306:18	Kalanick, Travis 2025-07-03 - PIP MP4	00:01:02	KT_v9p.109
	305:21 A. I wouldn't put him as one of my top		_
	305:22 people.		
	305:23 Q. Okay. Were you what did he do for		
	305:24 you?		
	305:25 A. He worked for somebody who worked for me.		
	306:01 Q. Okay.		
	306:02 A. He was a business development guy in		
	306:03 Asia.		
	306:04 Q. In Asia?		
	306:05 A. Yeah.		
	306:06 Q. And you had Uber had expanded to		
	306:07 India; right?		
	306:08 A. Yes.		
	306:09 Q. And you got kicked out of Delhi. Why did		
	306:10 you Uber get kicked out of Delhi?		
	306:11 A. There was there was an incident in		

PLF Affirmative PLF Counter DEF Counter 26 / 31

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DESIGNATION	SOURCE	DURATION	I D
	306:12 2014, like a some sort of, like, assault. Some		
	306:13 incident involving a female passenger that became	9	
	306:14 a pretty a pretty serious situation, and and		
	306:15 I there was some period of time where we were		
	306:16 not operating in Delhi.		
	306:17 Q. An Uber driver raped an Uber passenger in		
	306:18 India; correct?		
306:21 - 306:24	Kalanick, Travis 2025-07-03 - PIP MP4	80:00:00	KT_v9p.110
	306:21 THE WITNESS: I don't know the details,		
	306:22 but it's something it was a very serious		
	306:23 assault. And I don't know I don't know		
	306:24 the details exactly.		
307:12 - 307:13	Kalanick, Travis 2025-07-03	00:00:10	KT_v9p.111
	307:12 Q. Did Mr. Alexander somehow steal this		
	307:13 victim's medical records?		
307:15 - 308:11	Kalanick, Travis 2025-07-03	00:00:55	KT_v9p.112
307.13 - 300.11		00.00.55	K1_V9p.112
	307:15 THE WITNESS: I believe he had possession		
	307:16 of medical records.		
	307:17 BY MR. WILLIAMS:		
	307:18 Q. Could you explain how he came into		
	307:19 possession of the rape victim's medical records?		
	307:20 A. Lam not sure.		
	307:21 Q. Did you find out that he had the rape 307:22 victim's medical records?		
	307:23 A. Yes.		
	307:24 Q. Did you fire him when you found out he		
	307:25 had them?		
	308:01 A. No. We had them taken back.		
	308:02 Q. Did you ask him how he got them?		
	308:03 A. Like, my my recollection is that there		
	308:04 was a private investigator, or something along		
	308:05 these lines, who had access to it.		
	308:06 Q. A private investigator hired by who?		
	308:07 A. I'm not sure. It was something like		
	308:08 that. It was a long time ago, but it was		
	308:09 something like that.		
	308:10 Q. You don't know who hired the private		
	308:11 investigator?		
308:13 - 308:18	Kalanick, Travis 2025-07-03	00:00:14	KT_v9p.113
300.13 - 300.10	Tatamen, 114413 2023-01-03	00.00.14	1/1 _42h.113

PLF Affirmative PLF Counter DEF Counter 27 / 31

DESIGNATION	SOURCE	DURATION	I D
	308:13 THE WITNESS: It was 11 years ago.	<u> </u>	KT_v9p.113
	308:14 BY MR. WILLIAMS:		
	308:15 Q. Who would have motive to hire a private		
	308:16 investigator to go and get a victim's medical		
	308:17 records? Who would have that motive other than		
	308:18 Uber?		
308:20 - 308:25	Kalanick, Travis 2025-07-03	00:00:24	KT_v9p.114
	308:20 THE WITNESS: I understand what you're		
	308:21 saying. I just don't recall specifics.		
	308:22 But I do know that he had possession of		
	308:23 them, and we did we acted as fiercely as		
	308:24 we could to get them from him, and to make		
	308:25 sure that he no longer was carrying them.		
309:02 - 309:05	Kalanick, Travis 2025-07-03	00:00:10	KT_v9p.115
	309:02 Q. It was the wrong thing to do for him to		
	309:03 have her private medical records; you agree?		
	309:04 A. I think I think that's accurate.		
	309:05 Q. It's despicable, wouldn't you say?		
309:07 - 309:08	Kalanick, Travis 2025-07-03	00:00:05	KT_v9p.116
	309:07 THE WITNESS: I think it was most		
	309:08 definitely that. Not good.		
309:22 - 309:22	Kalanick, Travis 2025-07-03	00:00:06	KT_v9p.117
300.== 000.==	309:22 Q. Do you believe that that was ethical		
310:02 - 310:03	Kalanick, Travis 2025-07-03	00:00:06	KT_v9p.118
	310:02 Q ethical to have an investigator steal		- •
	310:03 her private medical records?		
310:05 - 310:08	Kalanick, Travis 2025-07-03	00:00:06	KT_v9p.119
310.03 310.00		00.00.00	1.1_v5p.113
	310:05 THE WITNESS: Oh, definitely not. If 310:06 that's what happened, definitely not. I		
	310:07 don't know what the laws are in India but		
	310:08 most definitely not.		
	•		
311:16 - 311:19	Kalanick, Travis 2025-07-03	00:00:16	KT_v9p.120
	311:16 Q. Did your own comms person send you the		
	311:17 information outlining all of these details of		
	311:18 of what happened?		
	311:19 A. I'm not sure.		
311:21 - 311:21	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:02	KT_v9p.121
	311:21 MR. MELUGIN: This will be 4808.		

PLF Affirmative PLF Counter DEF Counter 28 / 31

DESIGNATION	SOURCE	DURATION	I D
312:02 - 312:08	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:23	KT_v9p.122
	312:02 Q. And if we go to the top, Jill Hazelbaker,		
	she was she is now she worked for you as		
	312:04 in comms; right?		
	312:05 A. Yes.		
	312:06 Q. And on June 7, 2017, she emailed you this		
	312:07 article that's attached from Bloomberg; right?		
	312:08 A. This looks like an email, yes.		
312:14 - 312:20	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:12	KT_v9p.123
	312:14 Q. Well, if you look at the third paragraph,		
	312:15 it says:		
	312:16 "Kalanick and Michael discussed this case		
	312:17 periodically at the time."		
	312:18 Is that true or false?		
	312:19 A. I don't know. I can read this. I'll		
	312:20 read it.		
322:21 - 323:01	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:24	KT_v9p.124
	322:21 Q. Would you agree, Mr. Kalanick, from your		
	322:22 perspective, that there are some situations where		
	322:23 Uber drivers who have been subject to excuse		
	322:24 me Uber passengers, riders, who have been		
	322:25 victims of sexual misconduct, harassment, assault	,	
	or violence, should be compensated by Uber?		
323:03 - 323:05	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:07	KT_v9p.125
	323:03 THE WITNESS: I think there's there's		
	323:04 most definitely a set of circumstances that		
	323:05 would warrant that.		
323:15 - 323:17	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:07	KT_v9p.126
	323:15 But you admit, there are some		
	323:16 circumstances that you could visualize where Uber		
	323:17 should compensate some of these victims; right?		
323:20 - 323:20	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:02	KT_v9p.127
	323:20 THE WITNESS: Yeah.		
325:07 - 325:08	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:05	KT_v9p.128
	325:07 Q. And I want to go to the subject of your		
	325:08 business model.		
325:16 - 325:21	Kalanick, Travis 2025-07-03 - PIP MP4	00:00:16	KT_v9p.129

PLF Affirmative PLF Counter DEF Counter 29 / 31

DESIGNATION	SOURCE	p intention, movies vsp_ns i tayea in coure of	DURATION	I D
DESIGNATION	325:17	years I compliment you you had what I would call	DORATION	10
	325:18	years, I compliment you, you had what I would call explosive growth. I mean, pretty fantastic		
	325:19	growth.		
	325:20	Would you agree?		
		Yeah, it was it was unusual. Yeah.		
326:05 - 326:10	Kalanick,	Travis 2025-07-03 - PIP MP4	00:00:16	KT_v9p.130
	326:05	You went from zero dollars to, I don't		
	326:06	know how many billions in revenue. Do you recall		
	326:07	how many billions in revenue you had when you		
	326:08	left?		
		No. But, I mean, there's filings and		
	326:10	things that we could probably look up.		
327:03 - 327:11	Kalanick,	Travis 2025-07-03 - PIP MP4	00:00:30	KT_v9p.131
	327:03 Q.	Well, you admit that that kind of (edited)		
	327:04	growth, sometimes things get overlooked?		
	327:05 A.	Yes.		
	327:06 Q.	And would and, you know, part of that		
	327:07	growth is, you've got to have more and more		
	327:08	drivers; and the more drivers you have, the more		
	327:09	rides you can give, and the more money you can		
	327:10	generate.		
	327:11	Right?		
327:13 - 328:05	Kalanick,	Travis 2025-07-03 - PIP MP4	00:00:40	KT_v9p.132
	327:13	THE WITNESS: Yeah, I mean, if you have a		
	327:14	lot of riders, but you don't have enough		
	327:15	drivers, then you will only be giving a small		
	327:16	number of expensive rides.		
	327:17	BY MR. WILLIAMS:		
	327:18 Q.	And so drivers are essential to creating		
	327:19	growth and to create more dollars?		
	327:20 A.	If you only have riders, you don't have		
	327:21	Uber.		
	327:22 Q.	But is my statement accurate; that		
	327:23	drivers are essential to growth and increase in		
	327:24	revenue?		
	327:25 A.	Yeah, if you want to do more rides, you		
	328:01	need more drivers.		
	328:02 Q.	Common sense?		
	328:03 A.	Yeah.		
	328:04 Q.	Yeah. We're on the same page. Thank		

PLF Affirmative PLF Counter DEF Counter 30 / 31

KT_v9p - KALANICK, TRAVIS - v9p_As-Played in Court 01/14/2026

DESIGNATION	SOURCE	DURATION	I D
	328:05	you.	

TOTAL RUN TIME	00:43:06
DEF Counter	00:04:50
PLF Counter	00:00:19
PLF Affirmative	00:37:58

PLF Affirmative PLF Counter DEF Counter 31 / 31